



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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March 13, 2009

D.C. Orr
Citizens Advisory Group
P.O. Box 1268
Libby, MT 59923

Re: Libby Asbestos Superfund Site
Soil Management Handbook
February 2009 Draft

Dear DC:

I've received your letter dated March 1, 2009 and appreciate the comments you've provided on both the draft Soil Management Handbook, and the process under which it was developed.

While I share some of your concerns about delving too deeply into detailed aspects of possible operation and maintenance activities prior to selecting a remedy, I also believe that it is important to consider options to manage any residual waste early in the decision-making process. A thoughtful consideration of those options can positively influence the creation of alternatives to be considered in the feasibility study and ultimately the selected remedy. As you may know, the vast majority of Superfund Sites, when cleaned up, leave residual waste in place requiring future management to ensure continued protection of human health and the environment.

I appreciate the work the Operations and Maintenance (O&M) work group has completed to date. During our meeting in February, which you attended as an observer (I believe representing the City of Libby) it was agreed to put further work on the Soil Management Handbook on hold pending further progress on the Remedial Investigation and Feasibility Study report for the Export Plant (Operable Unit 1 of the Libby Asbestos Superfund Site). The O&M work group also agreed to 1) focus attention on remediation of Streets and Highways which may be impacted by asbestos, and to 2) research how Montana's U-Dig program may facilitate management of any residual contamination.

The O&M work group would benefit from having someone from the City of Libby participate in these discussions. City participation would be especially important as we consider the Export Plant which is owned by the City of Libby. Rather than respond to each of the concerns you've raised about individual sections of the Soil Management Handbook, I would encourage City participation in the work group to positively influence future work on the document as well as other activities affecting O&M for the Libby Asbestos Site.

Please be assured that no final decisions for the Export Plant will be made without public involvement and the opportunity for all stakeholders to participate. I will provide a partial draft Remedial Investigation to the stakeholders and public later this month with a complete Remedial Investigation and Feasibility Study to be provided in April or May.

Thank you again for your interest in the Soil Management Handbook. I look forward to working with you on the Libby Asbestos project.

Sincerely,

Rebecca J. Thomas
Project Manager

cc: Doug Roll, City of Libby Mayor
Sandy Matheny, O&M Facilitator
(for distribution to the O&M work group)

